

THE HONORABLE TIFFANY M. CARTWRIGHT

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON AT TACOMA

MELISSA GONZALEZ, individually

Plaintiff,

v.

MULTICARE HEALTH SYSTEM, a
Washington corporation,

Defendant.

NO. 3:23-cv-06053-TMC

ORDER COMPELLING DISCOVERY

THIS MATTER having come on regularly before the undersigned Judge of the above-entitled Court upon the parties' Joint Statement of Discovery Disputes. Having heard the arguments of counsel for each party during a hearing held on November 15, 2024, at 1 p.m., and having reviewed all pleadings and documents on file with the court, as well as the following:

1. Joint Statement of Discovery Disputes filed November 6, 2024;
2. The Exhibits attached to the Joint statement of Discovery Disputes;
3. _____

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ORDER COMPELLING DISCOVERY
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Now, therefore, it is hereby,

ORDERED, ADJUDGED AND DECREED that the following discovery responses and production are compelled:

1. Defendant shall provide a complete response to Plaintiff's Interrogatory No. 1, which shall include a list of nurses who worked in departments in which Plaintiff worked from January 1, 2018, through December 31, 2021. For each individual identified, Defendant shall provide last known contact information (including address, phone number, and/or email), identify the department in which they worked, and identify their hire date.

2. Defendant shall provide a complete response to Plaintiff's Interrogatory No. 8 and Request for Production No. 5. Defendant shall identify all job postings for nursing positions in the surgical oncology department, medical genetics department, and/or for a position working with Dr. Bobby Stevens, from January 1, 2021, through December 31, 2022. Defendant shall produce all documents which relate to such job postings.

3. Defendant shall provide a complete response to Plaintiff's Request for Production No. 6. Defendant shall produce applications for nursing positions in the surgical oncology department, the medical genetics department, and/or working with Dr. Bobby Stevens, from January 1, 2021, through December 31, 2022.

4. Defendant shall provide a complete response to Plaintiff's Interrogatory 11. Defendant shall provide a list of nurses hired to work in the surgical oncology department, the medical genetics department, and/or with Dr. Bobby Stevens, from January 1, 2021, through December 31, 2022. For each individual identified, Defendant shall provide last known contact information (including address, phone number, and/or email), identify the department in which they worked, and identify their date of hire.

1 5. Defendant shall provide a complete response to Plaintiff's Request for
2 Production No. 26. From December 1, 2021, through June 30, 2022, Defendant shall produce
3 documents which reflect how nurses who held float positions were compensated and their rates
4 of pay.
5

6 6. Plaintiff shall produce additional text messages exchanged between her and Dr.
7 Bobby Stevens and/or Ann Cruz – as discussed at her deposition on November 12, 2024 – to
8 the extent they are responsive to Defendant's discovery requests.
9

10 These discovery responses and production shall be exchanged between the parties by
11 no later than Monday, December 2, 2024.
12

13 Within fourteen (14) days of November 15, 2024, the Court will consider a petition
14 from Plaintiff for fees and costs associated with this hearing.
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16
17 DONE IN OPEN COURT this 15th day of November, 2024.
18

19
20 
21 JUDGE TIFFANY CARTWRIGHT

22
23 Presented by:

24 VAN SICLEN STOCKS & FIRKINS

25 By: /s/ Jeffrey O. Musto
26 Jeffrey O. Musto, WSBA # 52805
27 Attorneys for Plaintiff

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